

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 04-CR-10160-WGY
)
JUAN ROSARIO, et al.)
)

MOTION FOR EXTENSION OF TIME TO SUBMIT GOVERNMENT'S STATEMENT OF FACTS

____NOW COMES the United States of America, by its attorneys, Michael J. Sullivan, United States Attorney, and Cynthia W. Lie, Assistant U.S. Attorney, and respectfully requests a two week extension of time to file the government's statement of facts for defendants Luis Castro and Jose Montilla who pled guilty in this case on June 1, 2005, and for defendants Cesar Miranda and Ramon Villa who pled guilty on June 2nd. As grounds for this motion, the government states that the undersigned AUSA is currently on trial with the remaining co-defendant Anselmo Dominguez, and requests this extension to properly prepare the government's submission as to each defendant.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Cynthia W. Lie
CYNTHIA W. LIE
Assistant U.S. Attorney
United States Attorney's Office
One Courthouse Way, Suite 9200

Boston, MA 02210
(617) 748-3183

June 8, 2005